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*Verified Petitions for admission *pro*
hac vice forthcoming

Attorneys for Defendants Hartford Fire
Insurance Co., Hartford Accident and
Indemnity Co., and Hartford Casualty
Insurance Co.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RIMINI STREET, INC., a Nevada
corporation,

Plaintiff,

vs.

HARTFORD FIRE INSURANCE
COMPANY; HARTFORD ACCIDENT
AND INDEMNITY COMPANY;
HARTFORD CASUALTY INSURANCE
COMPANY; DOES 1 through X, inclusive;
and ROE CORPORATIONS I through X,
inclusive,

Defendants.

No. 2:15-CV-02292-JCM-CWH

**RESPONSE TO RIMINI'S
OBJECTION TO NOTICE OF
RELATED CASES**

TO BE FILED IN:

No. 2:15-CV-02292-JCM-CWH

No. 2:10-CV-00106-LRH-PAL

1 Defendants Hartford Fire Insurance Company, Hartford Accident and Indemnity
2 Company, and Hartford Casualty Insurance Company (collectively, “Hartford”) respectfully
3 submit this response to the Objection to Notice of Related Cases filed by Plaintiff Rimini Street,
4 Inc. (“Rimini”) (“Objection”) (Doc. No. 6).

5 1. Rimini accuses Hartford of engaging in “an improper attempt to interfere with
6 the Court’s standard case assignment procedure and to reveal insurance information to a finder
7 of fact in an unrelated case.” Objection at 2. Both assertions are without basis.

8 2. First, Local Rule 7-2.1 is an integral part of “the Court’s standard case
9 assignment procedure.” Local Rule 7-2.1 requires the filing of a Notice of Related Case where
10 counsel has reason to believe that an action on file is related to another action on file. *See* Local
11 Rule 7-2.1 (“Counsel who has reason to believe that an action on file or about to be filed is
12 related to another action on file (whether active or terminated) *shall file* in each action and serve
13 on all parties in each action a notice of related cases.”) (emphasis added). Because Judge Hicks
14 is presiding over the *Oracle* lawsuit, undersigned counsel had reason to believe that the two
15 actions fell within the scope of subpart (d) of the Local Rule and felt obligated to file the Notice
16 of Related Cases.

17 3. Second, the Notice of Related Cases does not contain any insurance information
18 that is not publicly available as a result of Rimini’s filing of its coverage action on July 23,
19 2015.

20 4. Local Rule 7-2.1(d) also provides, in a sentence omitted from Rimini’s
21 Objection, that “The assigned judges will make a determination regarding the consolidation of
22 the actions.” Hartford respectfully suggests that the Judges of this Court are in the best position
23 to determine whether assignment of this lawsuit to Judge Hicks will conserve judicial resources
24 and thus whether it is appropriate for related case treatment under Local Rule 7-2.1(d).
25 Accordingly, Hartford will not respond to the arguments made by Rimini at paragraphs 12

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2 through 14 (mistakenly numbered “7”) of the Objection.

3 DATED this 16th day of December, 2015.

4
5 By /s/ Jon T. Neumann

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of December, 2015, I caused to be electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court for the District of Nevada, using the electronic filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By /s/ Jacqueline Magee
An employee of Fox Rothschild LLP